

Human Rights Policy

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1. Purpose

This Human Rights Policy (the "Policy") sets out Partners Group's commitment to respecting internationally recognized human rights across the firm globally.

2. Scope of Application

The Policy applies to Partners Group worldwide. Where local legislation is more stringent, the local requirements will apply in addition to the Policy.

3. Requirements

As a responsible corporate citizen, Partners Group respects internationally recognised human rights and aims to not infringe on human rights, be complicit or contribute to human rights abuses. As a global private markets firm, Partners Group is responsible towards its employees, its investments¹, clients, and society at large.

Partners Group's Code of Conduct confirms its commitment to preserving high legal, ethical and moral standards, and aims to foster compliance with local and international laws and regulations. Partners Group aims to assess, identify, and monitor material human rights risks across its corporate and investment² activities (with various degrees of control and influence across its lead direct investments, secondaries and primaries), to address identified potential and actual human rights violations, as appropriate. Partners Group fosters a culture of compliance and ethically sound business conduct and invites its employees, clients, and external stakeholders to raise concerns about human rights violations, or if they know of or suspect conduct or occurrences that violate (other) laws or regulations. The Speak-Up Directive has been established internally to prevent and eliminate misconduct within its organization, including *inter alia* to provide remedy to actual negative human rights impacts.

4. Our commitment towards our Partners Group employees

Partners Group respects human rights in all its employment policies and practices and is committed to diversity and inclusion regardless of individual characteristics including, but not limited to, age, race, color, national origin or ancestry, sex (including pregnancy, childbirth or related medical conditions, and breastfeeding, religion or belief, creed, citizenship, marital status, family care status, physical or mental disability, genetic information, sexual orientation, gender, gender identity or expression, trans or transitioning status, political belief, military or veteran status, or employment status³, ethnicity, gender, nationality, age, ability, sexual orientation, or religion. Partners Group also respects freedom of

¹ The Scope as defined within Partners Group's [ESG & Sustainability Directive](#) (2021) Note 5.2.1 for direct investments, lead direct investments, secondaries and primaries.

² The Scope as defined within Partners Group's [ESG & Sustainability Directive](#) (2021) Note 5.2.1 for direct investments, lead direct investments, secondaries and primaries.

³ Partners Group prohibits discrimination as defined within Partners Group's [Prevention of Harassment, Discrimination and Retaliation Policy](#)

association and collective bargaining. Partners Group has a strict zero-tolerance of any kind of discrimination, human trafficking, forced labor and child labor.

5. Our commitment towards our clients

As a responsible investor, Partners Group is committed to high ethical standards, to invest responsibly and to lead its firm in a principled manner. Partners Group's commitment is demonstrated by its longstanding support of the UN Principles for Responsible Investment. Partners Group identifies and manages potential adverse impacts to human rights, that investments⁴ on behalf of its clients may be exposed to (with various degrees of control and influence across its lead direct investments, secondaries and primaries). Partners Group refrains from engaging in defined controversial activities, or to engage under stringent criteria.

6. Our commitment through the investment decision-making process and during ownership

The investment-making process is divided into the sourcing of potential investments and due diligence⁵. During the ownership period, Partners Group conducts monitoring of existing investments and engages as entrepreneurial owners. Partners Group avoids certain investment opportunities that are not acceptable from an investment risk perspective because of the products or services offered and/or the business' use of practices which cannot be remediated or managed through active ownership. Equally, Partners Group aims to avoid investing in businesses responsible for serious environmental damage or violations to human rights which cannot be remediated by responsible ownership, and businesses subject to targeted sanctions. Due diligence – adapted to the asset class and investment type – is required before an investment decision is made.

7. Communications and transparency

Partners Group reports on its human rights commitment and meaningful incidents, should they occur, within its annual Corporate Sustainability Report, an array of third-party ESG ratings and on our website. The Policy is subject to periodic review.

⁴ The Scope as defined within Partners Group's [ESG & Sustainability Directive](#) (2021) Note 5.2.1 for direct investments, lead direct investments, secondaries and primaries.

⁵ The Scope as defined within Partners Group's [ESG & Sustainability Directive](#) (2021) Note 5.2.1 for direct investments, lead direct investments, secondaries and primaries.